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Ser 1831.1/L6359
30 Aug 1996

Mr. Tom Lanphar
California Environmental Protection Agency
Department of Toxic Substances Control
700 Heinz Avenue, Suite 200
Berkeley, CA 94710-2737

Subj: RESPONSE TO THE DEPARTMENT OF TOXIC SUBSTANCES CONTROL'S
COMMENTS ON THE WORK PLAN FOR THE TIME CRITICAL REMOVAL
ACTION AT SITE 18 - STORM DRAIN SYSTEM AT NAS ALAMEDA

Dear Mr. Lanphar:

We are in receipt of the Department Of Toxic Substances Control's (DTSC) letter, dated July 1, 1996, recommending that the Time Critical Removal Action of the Storm Drain System be performed as an Operation and Maintenance Action. This recommendation is based on the administrative advantages to operation and maintenance actions. However, there are distinct health protective, schedule and cost benefits to continuing this action as originally outlined. The Storm Drain System was designated a CERCLA site because discharge of industrial wastes and possible infiltration from groundwater from CERCLA sites may have occurred. Based on this information, the Navy determined that these substances may cause imminent and substantial endangerment to human health and the environment. Therefore, the Navy initiated the cleanup of catch basins, manholes, and drain lines of the Storm Drain System at NAS Alameda as a time critical removal action.

A project scoping document, titled *Time Critical Removal Action Scoping - Site 18, Storm Drain System Solids and Debris Removal*, dated August 15, 1995, was issued regarding the time critical removal action at the Storm Drain System. The cleanup methodology was to first clean catch basins, then manholes and lines starting with the highest priority subsystems. In response to this design, the RWQCB recommended focusing on catch basins as a priority if funding became a limiting factor, and then the lines and manholes.

The removal action began, as designed, with the catch basins in October 1995. All catch-basin solids were removed by December 1995, just prior to the heavy part of the rainy season. As stated in Department Of Toxic Substances Control's letter of October 12, 1995, "For technical reasons, the second phase of the action, pressure washing the sewers lines must wait until the rains have ceased. A workplan will be developed for the second phase. The DTSC and RWQCB offer the enclosed comments on the Scoping Document for implementing the removal action." The workplan was finalized on July 8, 1996. Based on the current schedule the field work will be completed by December 1996.

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The Navy believes that it is appropriate to continue to conduct the cleanup of the Storm Drain System as a removal action for the following reasons because storm drain line and manhole field work is an ongoing part of the time critical removal action as outlined in the *Time Critical Removal Action Scoping - Site 18, Storm Drain System Solids and Debris Removal*, dated August 15, 1995. In accordance with previously agreed upon project documentation, the Navy is managing this removal action through proper site preparation, health and safety provisions, secondary containment, and sampling and closure plans.

The Action Memorandum for the Site 18 removal action was published in December 1995. The Action Memorandum indicates that the removal action would include the removal of solids from catch basins, manholes, and drain lines. Conducting the cleanup as an O&M would not be consistent with the Action Memorandum, as publicly noticed.

Further, had the Navy proceeded with this removal action as an O&M action as DTSC's suggests, rather than as a CERCLA removal action, significant time delays would be incurred due to altered funding sources and contracting mechanisms, as well as the need to procure permits. Delays for the administrative reasons mentioned above disregards the Navy's responsibility to protect human health and the environment on its facilities and reverses the plan that was agreed upon by the Navy and its regulatory partners.

As conveyed to DTSC's and the Regional Water Quality Control Board (RWQCB) in a letter dated June 15, 1995, the NAS Alameda Site 18 removal action has the one of the highest priorities in terms of removal actions. Viewing the unfavorable schedule impact, and possible continued impacts to the Bay as well as the community response to such a delay, the Navy has decided to continue the cleanup of the NAS Alameda storm Drain lines as previously outlined in the CERCLA removal action documentation..

If you have any questions regarding this matter, I can be reached at (415) 244-2570 or FAX (415) 244-2654.

Sincerely,

Original signed by:

HENRY C. GEE
Manager, BRAC Environmental Programs
By direction of
the Commanding Officer

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Copies to:

U.S. Environmental Protection Agency (Attn: Mr. James Ricks)
California Regional Water Quality Control Board (Attn: Ms. Gina Kathuria)
NAS Alameda (Attn: Mr. Steve Edde)
PRC Environmental Management, Inc. (Attn: Mr. Duane Balch)
International Technology Corp. (Attn: Mr. Gary Elston)
Restoration Advisory Board (Attn: Ken O'Donoghue)

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